

PLAINTIFF: Daniel E. Lafreniere

v

DEFENDANT: United States Of America

Ca. # 04-40070 NG
10/27/2004 16

PLAINTIFF'S RESPONCE TO DEFENDANT'S
MOTION TO EX TEND TIME IN WHICH TO
RESPOND TO COMPLAINT

The plaintiff responds to the Defendant's motion to ex tend time in which to respond to Complaint as follows:

(1) This is the third motion seeking additional time in a case in which the Defendant had supposedly conducted a thorough review of records so as to file truthful reports to Judge Ponsor months and years ago. The only new bassis for further time is the suggestion that the time might be used to "Determine whether the matter can be resolved short of motion practice, and/ or trial. This must mean that the United States needs 30 days more to decide whether to acknowledge that it owes me sixteen thousand dollars. I do not believe the United States Attorney can file a non-frivolous responsive pleading to my carefully drafted Complaint. I will examine any filing with Rule 11 in mind as I have stated from the outset of this case.

(2) If the Defendant does not agree to enter judgement for the Plaintiff in the amount of sixteen thousand dollars plus allowable interest and costs, by September 30, 2004, I herewith re-new my motion for default judgement.

CERTIFICATE OF SERVICE

I certify that on September 27, 2004, I caused a copy of the foregoing motion to be served by first class mail, postage prepaid to Defendant, the United States Of America, at the United States Attorney's Office, District of Massachusetts, John J. Moakley Courthouse, Suite 9200, One Courthouse way, Boston, Ma. 02210.

RESPECTFULLY SUBMITTED

Daniel E. Lafreniere 90333-038 Pro- Se.
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P.O. Box 879
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Daniel E. Lafreniere